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June 25, 2021

VIA ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Melius v. Andy King, 20 Civ. 5237 (ER)

Dear Judge Ramos:

I represent Plaintiff Shana Melius. Plaintiff writes to request a 60-day extension of the deadlines for the completion of discovery. The current deadline for non-expert discovery is June 30, 2021. The basis for this request is that document discovery has taken longer than anticipated given the delayed timing of Defendant Andy King's discovery responses and the related issues that were the subject of the conference with the Court on May 27, 2021. An extension is needed to allow sufficient time for the parties to complete necessary depositions.

Counsel for Defendant King has consented to this request, and no previous request for an extension of discovery has been made or granted. If the Court were to approve this request, the scheduling order currently in place (Dkt. No. 29) would be amended as follows:

- Non-expert depositions would be extended from June 30, 2021, until **August 30, 2021**;
- Further interrogatories, including expert interrogatories, and expert reports would be extended from July 14, 2021, until **September 14, 2021**;
- Rebuttal expert reports would be extended from August 11, 2021, until **October 12, 2021**;
- Expert depositions would be extended from August 24, 2021, until **October 25, 2021**;
- All discovery would be extended from August 24, 2021, until **October 25, 2021**.

In addition, the post-discovery case management conference currently scheduled for August 25, 2021, could be adjourned to a date and time that is convenient for the Court.

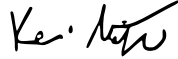
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Plaintiff is available to answer any questions that the Court may have concerning this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kevin Mintzer", with a stylized flourish at the end.

Kevin Mintzer

cc: Pamela D. Hayes, Esq. (by ECF)